

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 1:24-bk-03264-HWV  
IRENE PAPOUTSIS MULKERIN :  
: Chapter 7  
Debtor :  
:

**REPLY TO DEBTOR'S REQUEST FOR CLARIFICATION REGARDING  
ACCESS TO TRUST DOCUMENTS AND 120-DAY CLAIMS BAR IN  
SETTLEMENT AGREEMENT**

The Reply of The Andrew V. Papoutsis Irrevocable Trust (the "Trust") to the Request (the "Request") of Irene Papoutsis Mulkerin ("Debtor") for Clarification Regarding Access to Trust Documents and 120-Day Claims Bar in Settlement Agreement (Dkt. 510), is as follows:

1. As stated many times the Trust has provided settlement funds with respect to a settlement reached by the Chapter 7 Trustee and certain claims of the Debtor concerning the Trust.
2. The Settlement was approved by the Court by Order dated May 28, 2025 (Dkt. 410).
3. The Debtor is not a party to the settlement as all rights to the settlement are placed upon the Chapter 7 Trustee.
4. While it is possible that the Debtor may receive some funds from the Settlement, as there may be a surplus, to date, distribution has not yet occurred and, accordingly, the Debtor is not a party to the settlement.
5. The Trust is securing the funds by virtue of certain financing that it is obtaining as previously set forth in Court. The documents with respect to the obtaining of

these funds are not relevant to the Settlement, other than such funds are available and should be forthcoming by July 18, 2025.

6. The Debtor has no rights to see such documents if that is what the Debtor is requesting in Document Number 510.

7. There is no provision in the Bankruptcy Rules of Procedure or in the Federal Rules of Civil Procedure for filing the pleading at Document Number 510.

**WHEREFORE**, it is respectfully requested that this Court deny any requests for relief to the Debtor that may be set forth in document 510.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

By: /s/ Robert E. Chernicoff  
Robert E. Chernicoff, Esquire  
Attorney I.D. No. 23380  
2320 North Second Street  
P. O. Box 60457  
Harrisburg, PA 17106-0457  
(717) 238-6570  
[rec@cclawpc.com](mailto:rec@cclawpc.com)

Date: July 14, 2025